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COMMITTEE OF EXPERTS ON THE
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Sub-Committee of Experts on the
Transport of Dangerous Goods
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GLOBAL HARMONIZATION OF SYSTEMS OF CLASSIFICATION AND LABELLING OF CHEMICALS

Physical hazards

Cut-off limits for organic peroxide classification

Transmitted by the European Chemical Industry Council (CEFIC)

1. Introduction

During the meetings of the joint ILO/UN Working group on Harmonized classification criteria for flammability and reactivity held in 1995/1996, the classification of organic peroxides has been discussed. It was felt that organic peroxides should be assigned to a separate hazard category. The current status of the various hazard categories is given in document ST/SG/AC.10/R.547.

One aspect which needs to be resolved is the cut-off level of peroxide concentration and/or active oxygen concentration. The following two different cut-off levels are currently used. Most recommendations and guidelines use the higher cut-off level as given in the UN Recommendations, 11.3.2.1 (9th revised edition). European Union directives use the lower cut-off limit. More detailed description of this is given in documents ST/SG/AC.10/C.3/R610/Rev.1, Harmonized classification criteria for reactive substances, section 14 and Annex and ST/SG/AC.10/C.3/R.775, Harmonized Classification Criteria for Reactive Substances.

After several lengthy discussions, no agreement was achieved on the cut-off level, notwithstanding the fact that the differences of both cut-off levels are minor with respect to safety.

2. CEFIC position

In Europe, due to the existing two cut-off levels the situation occurs that organic peroxide formulations with low peroxide concentration have to be labelled for handling purposes according to the legislation of the European Union (EU) whereas labelling is not required for transport purposes according to UN and other transport modes regulations.

In practise this leads to confusion: users receive a non-dangerous good according transport regulations but the product has to labelled (already done or upon arrival) for handling purposes.

CEFIC is of the opinion that, regardless which (EU or UN) cut-off level finally will be chosen, it is of more importance that only one level is chosen for both transport and handling/workplace safety. This will avoid the confusion as described before.

3. Proposal

CEFIC proposes to use one cut-off level for the hazard category "organic peroxides" in the global harmonised classification system to avoid any confusion in labelling and hazard communication.